

State Water Resources Control Board
Division of Drinking Water

August 14, 2014

Rachel Arias
Mountains Sector Maintenance Chief II
California State Parks – Big Basin
21600 Big Basin Way
Boulder Creek, CA 95006

Attention Ms. Arias:

CITATION NO. 02-05-14C-011-4410301-02
CITATION FOR TOTAL TRIHALOMETHANE MCL EXCEEDANCE
CALIFORNIA STATE PARKS - BIG BASIN (SYSTEM NO. 4410301)

Enclosed is a Citation issued to the California State Parks – Big Basin (CSP Big Basin) water system for failure to comply with primary maximum contaminant level (MCL) for Total Trihalomethanes (TTHM) as specified in Section 64533(a) of the California Code of Regulations.

CSP Big Basin failed to comply with the locational total trihalomethane (TTHM) MCL at the Little Basin Main Office sample site. Following quarterly chemical TTHM analysis completed on May 21, 2014, the Little Basin Main Office site exceeded the TTHM MCL of 0.080 mg/L (80 ug/L) with a running annual average TTHM concentration of 0.103 mg/L (103 ug/L).

CSP Big Basin distributed a Tier 2 public notification to its residents on July 23, 2014, and submitted proof of notification to the Division on July 23, 2014. Please send proof of third quarter 2014 (July 1st – September 30th) public notification to the Division by **October 10, 2014**.

The Citation consists of five sections: Applicable Authorities, Statement of Facts, Determination, Directives, and Further Enforcement Actions. The Applicable Authorities and Statement of Facts sections describe the events leading to the issuance of the Citation. The Directives section specifies required actions that must be implemented by the water system to return to compliance. The Further Enforcement Actions section describes penalties to be assessed for failure to comply with the Citation. No civil penalty is levied with the attached Citation.

Your water system will be billed at the Division's hourly rate for the time spent on issuing this Citation since this is an enforcement action for noncompliance with state regulations. The water system will receive a bill from our Fee Billing Unit in Sacramento.

August 14, 2014

If you have any questions regarding this matter, please contact Jonathan Weininger at (831) 655-6932 or me at (831) 655-6934.

Sincerely,



Jan R. Sweigert, P.E.
District Engineer, Monterey District Office
Northern California Field Operations Branch
Drinking Water Program

CERTIFIED MAIL NO.: 7008-1830-0004-5435-0608

Enclosures: Citation No. 02-05-14C-011-4410301-02
Attachment A: Proof of Notification Form

cc: Santa Cruz Environmental Health Department (w/out attachments)

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7

Attn: Ms. Rachel Arias, Maintenance Supervisor
California State Parks – Big Basin

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

16
17
18
19
20
21
22
23
24
25
26
27

18
19
20
21
22
23
24
25
26
27

24
25
26
27

1 CA 95018) for violation of California Code of Regulations (CCR), Title 22, Section
2 64533 subsection (a).

3 **APPLICABLE AUTHORITIES**

4 **Section 116650 of California Health and Safety Code provides:**

5 (a) If the department determines that a public water system is in violation
6 of this chapter or any regulation, permit, standard, citation, or order issued or adopted
7 thereunder, the department may issue a citation to the public water system. The
8 citation shall be served upon the public water system personally or by certified mail.
9 Service shall be deemed effective as of the date of personal service or the date of
10 receipt of the certified mail. If a person to whom a citation is directed refuses to accept
11 delivery of the certified mail, the date of service shall be deemed to be the date of
12 mailing.

13 (b) Each citation shall be in writing and shall describe the nature of the
14 violation or violations, including a reference to the statutory provision, standard, order,
15 citation, permit, or regulation alleged to have been violated.

16 (c) A citation may specify a date for elimination or correction of the
17 condition constituting the violation.

18 (d) A citation may include the assessment of a penalty as specified in
19 subdivision (e).

20 (e) The department may assess a penalty in an amount not to exceed
21 one thousand dollars (\$1,000) per day for each day that a violation occurred, and for
22 each day that a violation continues to occur. A separate penalty may be assessed for
23 each violation.

1 California Code of Regulations, Title 22, Section 64533, subsection (a) provides,
2 in relevant part:

3
4 (a) Using the monitoring and calculation methods specified in sections
5 64534, 64534.2, 64535, and 64535.2, the primary MCLs for the disinfection
6 byproducts shown in table 64533-A shall not be exceeded in drinking water supplied
7 to the public.

8
9 **Table 64533-A**
10 Maximum Contaminant Levels and Detection Limits for
11 Purposes of Reporting Disinfection Byproducts

	<i>Maximum</i>	<i>Detection Limit for</i>
	<i>Contaminant</i>	<i>Purposes of Reporting</i>
<u>Disinfection Byproduct</u>	<u>Level (mg/L)</u>	<u>(mg/L)</u>
Total trihalomethanes (TTHM)	0.080	
Bromodichloromethane		0.0010
Bromoform		0.0010
Chloroform		0.0010
Dibromochloromethane		0.0010

20
21 **STATEMENT OF FACTS**

22 The CSP Big Basin water system is operated under Water Supply Permit No. 86-009,
23 issued on March 13, 1986.

24
25 CSP Big Basin serves water to an estimated transient population of 3,000. CSP Big
26 Basin is located in the Santa Cruz Mountains. CSP Big Basin consists of one local
27 surface water source (Sempervirens Reservoir), one microfiltration and GAC surface

1 water treatment plant, sodium hypochlorite for disinfection, and seven storage tanks
2 (six redwood and one stainless steel).

3 Pursuant to Title 22, CCR, Section 64534.2(d), CSP Big Basin is required to collect
4 two distribution system samples per quarter for TTHM and HAA5 analyses in
5 accordance with their approved Stage 2 DBPR Monitoring Plan. Under Title 22, CCR,
6 Section 64535.2(b)(1), compliance with the TTHM MCL of 0.080 mg/L is based on a
7 running annual average, calculated quarterly, for each monitoring location.

8
9 The following is a chronology of events that occurred leading up to the TTHM MCL
10 failure at the Little Basin Main Office Monitoring Location:

11
12 4th Quarter 2013 (November 21, 2013): Little Basin Main Office TTHM Result: 84
13 ug/L.

14
15 1st quarter 2014 (February 19, 2014): Little Basin Main Office TTHM Result: 170 ug/L.
16 Running annual average value $(4Q2013+1Q2014) / 4 = 63.5$ ug/L.

17
18 2nd Quarter 2014 (May 21, 2014): Little Basin Main Office TTHM Result: 160 ug/L.
19 Running annual average value $(4Q2013+1Q2014+2Q2014) / 4 = 103.5$ ug/L.

20
21 Following the second quarter 2014, with three quarters of TTHM results, CSP Big
22 Basin's TTHM running annual average is calculated to be 103.5 ug/L, which exceeds
23 the TTHM MCL of 80 ug/L.

1 **DETERMINATION**

2 The Division has determined that CSP Big Basin failed to comply with the Maximum
3 Contaminant Level (MCL) for total trihalomethanes (TTHM) at the Little Basin Main
4 Office site for the three-quarter monitoring period of October 1, 2013, through June
5 30, 2014. For a public water system monitoring quarterly, each locational running
6 annual average (LRAA), computed quarterly, shall not exceed the MCL of 0.080 mg/L
7 (80 µg/L) for total trihalomethanes, consisting of chloroform, bromodichloromethane,
8 dibromochloromethane, and bromoform. The TTHM LRAA for the three-quarter
9 monitoring period of October 1, 2013, through June 30, 2014, was 103.5 µg/L at the
10 Little Basin Main Office sample site.

11
12 CSP Big Basin distributed a Tier 2 public notification to its residents and posted the
13 notice in public places on July 24, 2014. CSP Big Basin provided proof of notification
14 to the Division on July 24, 2014.

15
16 **DIRECTIVES**

17
18 CSP Big Basin is hereby directed to take the following actions:

- 19
- 20 1. Forthwith, CSP Big Basin shall cease and desist from failing to comply with the
21 MCL for total trihalomethanes (TTHM).
 - 22
23 2. Effective Immediately, CSP Big Basin shall post Division-approved notices at
24 residences and in public locations. These notices must be updated quarterly until
25 such time that the Division notifies CSP Big Basin that monitoring results indicate
26 that CSP Big Basin has returned to compliance with the TTHM MCL. Proof of

1 notification shall be sent to the Division within 10 days following the end of each
2 quarter that CSP Big Basin is still in violation of the TTHM MCL.
3

4 3. By **November 30, 2014**, , CSP Big Basin shall submit to the Division for review
5 and approval, a plan and compliance schedule for improvements to the water
6 system to correct the TTHM water quality problem and eliminate the delivery of
7 water to consumers that does not meet the TTHM primary drinking water
8 standards. Following submittal of the schedule, the System shall submit monthly
9 progress reports to the Division by the tenth day of each month until the System
10 returns to compliance.
11

12 4. By **December 31, 2015**, CSP Big Basin shall complete all the improvements in the
13 proposed project submitted pursuant to Directive 3 above in accordance with the
14 compliance schedule to be reviewed and approved by the Division.
15

16 5. By **September 10, 2014**, CSP Big Basin shall submit a written response to the
17 Division indicating its willingness to comply with the Directives of this Citation.
18

19 6. CSP Big Basin shall include information regarding the TTHM MCL violation
20 identified in this Citation in the 2014 Consumer Confidence Report, which must be
21 completed and distributed by **July 1, 2015**. A draft of the 2014 Consumer
22 Confidence Report shall be submitted to the Division for review and approval prior
23 to distribution and/or posting.
24

1 The Division reserves the right to make such modifications to this Citation as it may
2 deem necessary to protect public health and safety. Such modifications may be
3 issued as amendments to this Citation, and shall be deemed effective upon issuance.
4

5 Nothing in this Citation relieves CSP Big Basin of its obligation to meet the
6 requirements of the California Safe Drinking Water Act, or of any regulation, permit,
7 standard, or order issued or adopted thereunder.
8

9 All submittals required by this Citation shall be submitted to the Division at the
10 following address:

11
12 Jan Sweigert, P.E.
13 District Engineer
14 State Water Resources Control Board
15 Division of Drinking Water
16 1 Lower Ragsdale Dr., Bldg. 1, Suite 120
17 Monterey, CA 93940
18

19 **PARTIES BOUND**

20 This Citation shall apply to and be binding upon CSP Big Basin, its officers, directors,
21 shareholders, agents, employees, contractors, successors, and assignees.
22

23 **SEVERABILITY**

24 The Directives of this Citation are severable, and CSP Big Basin shall comply with
25 each and every provision thereof, notwithstanding the effectiveness of any other
26 provision.
27
28

1 **FURTHER ENFORCEMENT ACTION**

2 The California SDWA authorizes the Division to: issue citation with assessment of
3 administrative penalties to a public water system for violation or continued violation of
4 the requirements of the California SDWA or any permit, regulation, permit or order
5 issued or adopted thereunder including, but not limited to, failure to correct a violation
6 identified in a citation or compliance order. The California SDWA also authorizes the
7 Division to take action to suspend or revoke a permit that has been issued to a public
8 water system if the system has violated applicable law or regulations or has failed to
9 comply with an order of the Division; and to petition the superior court to take various
10 enforcement measures against a public water system that has failed to comply with
11 violates an order of the Division. The Division does not waive any further enforcement
12 action by issuance of this citation.

13
14
15
16
17 8/14/2014

18 Date

17 Jan Sweigert

19 Jan Sweigert, P.E.,
20 District Engineer
21 Division of Drinking Water
22 State Water Resources Control Board

23
24 Attachments:

25 1. Proof of Notification Form
26
27

28 cc: County of Santa Cruz, Department of Environmental Health



PROOF OF NOTIFICATION

Name of Water System: **California State Parks – Big Basin**

System Number: **4410301**

Certification

As required by Section 64463.4 of the California Code of Regulations, I notified the users of the water supplied by California State Parks – Big Basin of the TTHM violation of Section 64533(a) of the California Code of Regulations for the compliance period of July 1, 2014 to September 30, 2014. I complied with the directives of this order as indicated below:

Required Action	Date Completed
Public Notification – Mail or Direct Delivery	<input type="text"/>
Public Notification – Posting in Public Places Served by the Water System or publication in a newspaper	<input type="text"/>

Signature of Water System Representative

Date

Attach a copy of the direct delivery/mail notice and a copy of the public posting.

THIS FORM MUST BE COMPLETED AND RETURNED TO THE DIVISION
